

HON. MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

HEATHER HALEY, as an individual and as a  
representative of the classes,

Plaintiff,

v.

TALENTWISE, INC. f/k/a/ TALENTWISE  
SOLUTIONS, LLC f/k/a INTELIUS  
SCREENING SOLUTIONS, LLC, ,

Defendant.

Case No. 2:13-cv-01915-MJP

**PLAINTIFF'S NOTICE OF  
SUPPLEMENTAL AUTHORITY**

Note on Motion Calendar:  
March 14, 2014

Pursuant to Local Rule 7(n), Plaintiff Heather Haley respectfully submits this Notice of Supplemental Authority in further support of Plaintiff's Opposition to Defendant's Motion to Dismiss the Amended Complaint. On February 20, 2014, the United States filed a brief in *Dowell v. Gen. Info. Servs., Inc.* Memorandum of the United States of America in Support of the Constitutionality of § 1681c of the Fair Credit Reporting Act at 17, *Dowell v. Gen. Info. Servs., Inc.*, No. 13-CV-02581-L-BGS (S.D. Cal., Feb. 20, 2014) (stating at 17 that dismissed charges, even if associated with a conviction, may not be reported under the Fair Credit Reporting Act).

A copy of the United States' brief is attached hereto as Exhibit A. Because the relevant portion of the United States' brief cites to the allegations in *King v. General Info. Servs. Inc.*,

No. 2:10-cv-6850-PBT (E.D. Pa. Feb. 14, 2011), a copy of the operative complaint in *King* is attached hereto as Exhibit B.

Date: March 3, 2014

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2014, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Date: March 3, 2014

/s/Daniel C. Bryden

Daniel C. Bryden